

United States District Court
Eastern District of Michigan
Southern Division

United States of America,

Case No. 19-cr-20026

Plaintiff,

Honorable Gershwin A. Drain

v.

D-1 Bharath Kakireddy,
D-2 Suresh Reddy Kandala,
D-3 Phanideep Karnati
D-4 Prem Kumar Rampeesaa,
D-5 Santosh Reddy Sama,
D-6 Avinash Thakkallapally,

Defendants.

First Forfeiture Bill of Particulars

The United States, by and through its counsel, submits this First Forfeiture Bill of Particulars, pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure to supplement and clarify the forfeiture allegations contained in the Indictment and to provide notice of specific property the government intends to forfeit upon conviction.

The allegations set forth in the Indictment are re-alleged and incorporated herein by this reference for the purpose of providing notice of the forfeiture

allegations contained in the Indictment, pursuant to Federal Rule of Criminal Procedure 32.2(a) and 18 U.S.C. § 982(a)(6) and/or 18 U.S.C. § 981(a)(1)(C), together with 28 U.S.C. § 2461(c), which includes, but is not limited to:

- Forty-five dollars and ten cents (\$45.10) U.S. Currency seized from Bank of America Account Number XXXXXXXXX0175 in the name of Bharath Kakireddy;
- Two Thousand, Eight Hundred Thirty-three Dollars and Fifty-seven Cents (\$2,833.57) U.S. Currency seized from Wells Fargo Account Number XXXXXX0535 in the name of Avisash Thakkallapally;
- One Thousand, Three Hundred Forty-eight Dollars and Fifty-nine cents (\$1,348.59) U.S. Currency seized from Bank of America Account Number XXXXXXXXX2667 in the name of Santosh Reddy Sama;
- A forfeiture money judgment against Bharath Kakireddy in favor of the United States in the amount of \$32,454.90;

This Forfeiture Bill of Particulars is also filed to comply with the provisions of Title 18, United States Code, Section 983(a)(3), and the government reserves its right to file a civil forfeiture complaint regarding the identified property, if necessary, at the conclusion of this criminal action.

This notice does not limit the government from seeking the forfeiture of additional specific property, including substitute assets, or limit the government from seeking the imposition of additional forfeiture money judgments.

Respectfully submitted,

Matthew Schneider
United States Attorney

S/Michael El-Zein
Michael El-Zein (P79182)
Assistant U.S. Attorney
211 W. Fort Street, Ste. 2001
Detroit, Michigan 48226
(313) 226-9770
Michael.El-Zein@usdoj.gov

Dated: May 1, 2019

Certification of Service

I hereby certify that on May 1, 2019, the foregoing document filed with the Clerk of the Court using the ECF system, which will electronically serve all ECF participants.

S/Michael El-Zein
Michael El-Zein (P79182)
Assistant U.S. Attorney
211 W. Fort Street, Ste. 2001
Detroit, Michigan 48226
(313) 226-9770
Michael.El-Zein@usdoj.gov